

February 3, 2003

Mr. G. William Pennington
Chief Energy Efficiency Program Specialist
California Energy Commission
1516 9th Street, MS 28
Sacramento, CA 95814-5512

**Subject: Requirement for CTI Certification of Evaporative Heat Rejection
Equipment in the 2005 Building Energy Efficiency Standards,
California Building Code Title 24, Part 6**

Dear Mr. Pennington,

I am writing to express the support of Hussmann Corporation for the inclusion of a mandatory requirement for third party, CTI certification of cooling tower energy performance in the 2005 Building Energy Efficiency Standards. As a leading provider of integrated commercial and industrial refrigeration systems, Hussmann Corporation is well aware of the detrimental impact an under-sized heat rejection device can have on overall refrigeration system performance. It has been our experience that, in the absence of third party certification, the quality of manufacturer supplied performance data is often less than satisfactory.

Hussmann Corporation has been an outspoken advocate of third party certification of evaporative condenser performance for more than twenty years and is equally supportive of third party, CTI certification of cooling tower performance. We believe third party certification is the only cost effective means by which manufacturer's performance can be deemed reliable.

Having reviewed Draft 3 of the 2005 Standards dated February 2003, I would recommend two modifications to Table 112-H which will enable an even greater benefit to be derived from a requirement for CTI certified cooling tower performance:

- 1 Eliminate the minimum flow requirement of 300 gpm as called out in "Note C" on the table. Certified cooling tower performance should be required on all systems, regardless of capacity. To our knowledge, the majority of cooling tower product lines being sold in the US today are already CTI certified, even those of the smallest capacities.

2. Include minimum efficiency requirements for closed circuit cooling towers. Closed circuit towers are commonly applied in space conditioning applications and should also be embraced by the 2005 Standards. Performance of closed circuit cooling towers should also be certified as specified in CTI STD-201.

On behalf of Hussmann Corporation I applaud your inclusion of a requirement for CTI certification of cooling tower performance and appreciate your consideration of my suggested modifications to Table 112-H. Please feel free to call me should you want to discuss these points further.

Sincerely,

A handwritten signature in black ink, appearing to read 'Olin S. Cunningham', with a stylized flourish at the end.

Olin S. Cunningham, P.E.
Director – Industrial Sales
Hussmann Corporation